

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

THOMAS SIEBERS, <i>individually and</i>)	
<i>on behalf of his wife, late Julie Siebers,</i>)	
<i>deceased,</i>)	
Plaintiff,)	
)	
v.)	Case No.
)	
PROFESSIONAL RECOVERY)	
CONSULTANTS INC.,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Defendant, Professional Recovery Consultants, Inc. (“PRC”), hereby files its Notice of Removal for the above-captioned case to this Court, and in support of this removal, respectfully states as follows:

1. Defendant PRC is named as defendant in Civil Action No. 2021CV000006 filed in the Circuit Court of Outagamie County, Wisconsin, styled *Siebers v. Professional Recovery Consultants, Inc.* (“the State Court Action”).

2. The Petition in the State Court Action was filed with the Clerk of the Outagamie County Court, Wisconsin, on or about January 6, 2021. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings and orders served upon Defendant PRC in the State Court Action are attached hereto as **Exhibit A**.

3. In the State Court Action, Plaintiff alleges that Defendant PRC violated a federal statute, the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.*

4. Any civil action is removable if the plaintiff could have originally brought the action in federal court. *See*, 28 U.S.C. § 1441(a).

5. Under 28 U.S.C. § 1331 this Court has original federal question jurisdiction over Plaintiff's FDCPA claims.

6. Accordingly, pursuant to 28 U.S.C. § 1441(a), Defendant PRC has the right to remove the State Court Action to this Court, without regard to the citizenship or residency of the parties or the amount in controversy.

7. Defendant PRC was formally served with the Summons and Petition on January 19, 2021. This removal is therefore timely pursuant to 28 U.S.C. § 1446(b).

8. By this Notice of Removal, Defendant PRC does not waive any defense, jurisdiction or otherwise, which it may possess. Defendant PRC also does not concede that Plaintiff has stated a claim against it.

WHEREFORE, in accordance with the authorities set forth above, Defendant PRC hereby removes this action from the Circuit Court of Outagamie County, Wisconsin, to the United States District Court for the Eastern District of Wisconsin.

Dated: February 16, 2021

/s/ Nicole M. Strickler
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CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2021, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which will send notification of such filing to the attorneys of record.

/s Nicole M. Strickler _____

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